

<HTML><PRE><FONT COLOR="#000000" BACK="#ffffff" SIZE=3>Subj: Re: C & F  
Block PCS - NAPE Position Letter to FCC  
Date: 97-06-05 03:51:00 EDT  
From: fmbnape@us.net (Faith Muir-Brown)  
Reply-to: fmbnape@us.net  
To: kcarroll@nextwavetel.com, RRAKLG@aol.com

John\_Warta@gstworld.net wrote:

>  
> Thank you for your letter of today. I am encourage by your letter, and the  
> hope that the FCC will favorably address this issue. Obviously, they have  
> acted on behalf of Nextwave to open Foreign ownership. I do suggest one  
> other alternative to your deferred payment plan, and that is a franchise  
> fee. The fee would be sturctured based on the price per POP paid for the  
> licenses, similar to the following:  
>  
>   Per Pop     Franchise Fee  
>   \$5           .5%  
>   \$10          1.0%  
>   \$20          2.0%  
>   \$30          3.0%  
>   \$40          4.0%  
>   etc.  
>  
> This structure would delay the payments of any real size to the backend of  
> the 10 years like your proposal, create an immediate franchise asset (the  
> license) which could be leveraged and liened for Wall Street, and enable  
> the FCC to save face, because it won't be until 10 years from now, when we  
> know whether or not the Franchise Fee would equal the actual bid price. A  
> delay of the Interest and Bid Prices for 5 years is very helpful, but  
> paying interest and principal 5 years from now on very high prices will  
> still be very high.  
>  
> Your consideration of this alternate payment plan would be appreciated.  
> Perhaps, the FCC might allow the operator to pick, either a deferred  
> payment, or a franchise fee concept.  
</FONT><FONT COLOR="#0f0f0f" BACK="#fffffe" SIZE=3>

----- Headers -----

From fmbnape@us.net Wed Jun 4 16:10:59 1997

Return-Path: <fmbnape@us.net>

Received: from us.net (laurel.us.net [198.240.72.4])

by mrin62.mail.aol.com (8.8.5/8.8.5/AOL-4.0.0)

with ESMTP id QAA20610 for <RRAKLG@aol.com>;

Wed, 4 Jun 1997 16:10:58 -0400 (EDT)

Received: from enda04.usnet.us.net (enda04.usnet.us.net [198.240.65.18]) by us.net



June 3, 1997

Michael Roberts  
Chairman and CEO  
Roberts-Roberts & Associates, LLC  
1408 No. Kingshighway  
St. Louis, Missouri 63113

Dear Mr. Roberts:

NextWave Telecom Inc.

I have received a copy of the National Association of PCS Entrepreneurs (NAPE) position paper on restructuring C and F block debt. NextWave is very supportive of your position that the FCC should restructure C and F block debt. We appreciate your efforts to start the dialog on an appropriate restructuring solution and to provide the Federal Communications Commission (FCC) with useful information.

NextWave plans to file comments to the FCC's recently released public notice on this subject and will address the specifics of your proposal at that time. However, as an entrepreneurial PCS company and a member of NAPE, we wished in advance to express support for your efforts.

Best regards.

Sincerely,

Janice Obuchowski  
Vice Chairman

cc: Kevin Carroll

1101 Pennsylvania Avenue, N.W.

Suite 305

Washington, D.C. 20004

Tel. 202.347.2771

Fax. 202.347.2822

www: nextwave.com



# Georgia Independent PCS Corp.



Atlanta, GA 30309

Atlanta, GA (404) 743-8804

June 10, 1997

Mr. Michael Roberts  
Chairman  
National Association of PCS Entrepreneurs

VIA: Facsimile - (703) 438-4622

Dear Mr. Roberts:

- As a C-Block Carrier in Georgia, backed by rural independent telephonic companies, we appreciate your efforts on behalf of all C&F Carriers. I have read the NAFB position paper and discussed it with one of your board members. We would entertain any suggestions of our FCC license provisions which would allow us to focus our capital on network build-out and service start-up. Our board will be reviewing a response to the FCC request for comments on this issue.

I will keep you informed of our actions. Thanks you for your efforts.

Sincerely,

Rob Brooks  
General Manager

RB/pp



# Savannah Independent PCS Corp.



P.O. Box 18162  
Macon, GA 31209

Phone: (912) 742-2202  
Facsimile: (912) 742-2204

• June 10, 1997

Mr. Michael Roberts  
Chairman  
National Association of PCS Entrepreneurs

VIA Facsimile - (763) 439-4632

Dear Mr. Roberts:

As a C-Block Carrier in Georgia, backed by rural independent telephone companies, we appreciate your efforts on behalf of all C&F Carriers. I have read the NAPE position paper and discussed it with one of your board members. We would entertain any restructuring of our FCC license payments which would allow us to focus our capital on network build-out and service start-up. Our board will be reviewing a response to the FCC request for comments on this issue.

I will keep you informed of our actions. Thanks you for your efforts.

Sincerely,

• Rob Brooks  
General Manager

RB/pp

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
	)	
	)	
BROADBAND PCS C AND F BLOCK	)	WT Docket No. 97-82
INSTALLMENT PAYMENT ISSUES	)	DA 97-679
	)	
	)	
	)	

COMMENTS OF NABTP

The National Association of Black Telecommunications Professionals, Inc., ("NABTP") respectfully submits its comments in the above-captioned proceeding.

SUMMARY

NABTP is a proponent of restructuring the C and F Block repayment schedule to suspend all payments until the fifth year of a license (coupled with rigorously enforced facility build out requirements) along with the repayment of the balance of the principal and interest over the remaining five year schedule.

COMMENTS

The NABTP was formed in 1991 as a not-for-profit corporation dedicated to the advancement of minorities specifically within the field of telecommunications. Among other things, the NABTP identifies and analyzes technology issues that intersect with issues relevant to minority telecommunications professionals nationally, highlights those issues for our membership, and for legislative and regulatory entities.

It is our belief that the current C and F Block repayment schedule will negatively impact upon minority ownership opportunities, minority employment opportunities, and competition. The current schedule whereby interest only payments must be submitted quarterly for the first five (5) years of the license and interest plus principal during years six (6) through ten (10) is a serious drain on the financial resources of the C and F Block PCS licensees; namely minority and women-owned businesses, and small businesses. This financial obligation seriously impedes the C and F Block PCS licensees ability to negotiate competitive financing terms and the ability to attract investors. The current FCC payment schedule requires licensees to choose

restructuring of the repayment schedule coupled with enforcement of facility build out requirements would dictate that current staffing levels be increased thereby creating new employment opportunities for minorities. And last but not least, C and F Block licensees would have a real opportunity to accomplish the purpose for which they were authorized - increased competition.

Respectfully submitted,

NABTP, INC.



Nathan Roberts

Attorney at Law

7442 Ahern Avenue  
St. Louis, Missouri 63130  
(314) 862-5853

May 20, 1997